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Attorneys for Defendant PeaceHealth d/b/a
PeaceHealth Ketchikan Medical Center

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

Terri Bermudez, Personal Representative)	
of the Estate of Tonya Vonda,)	
)	
Plaintiff,)	
)	
vs.)	
)	
PeaceHealth d/b/a PeaceHealth)	Case No. _____
Ketchikan Medical Center and NES)	
Healthcare Group, Inc.,)	
)	
Defendants.)	
_____)	

**NOTICE OF REMOVAL OF CASE FROM STATE COURT
(SUPERIOR COURT NO. 1KE-16-00514 CIVIL)**

TO THE DISTRICT COURT OF THE UNITED STATES, DISTRICT OF ALASKA,
AND TO PLAINTIFF AND HER ATTORNEY OF RECORD:

PLEASE TAKE NOTICE that Defendant, PeaceHealth d/b/a PeaceHealth Ketchikan Medical Center ("PeaceHealth") contemporaneous with the filing of this "Notice of Removal of Case From State Court," is effectuating the removal of the above-referenced action from the Superior Court of the State of Alaska, First Judicial District at Ketchikan, to the United States District Court for the District of Alaska. A true and

correct copy of the "Notice to Superior Court of Filing Notice of Removal," filed in Case No. 1KE-16-00514 CI, is attached hereto as **Exhibit A**. The removal is based on the following grounds:

1. On or about November 25, 2016, Plaintiff filed as *pro se* the above titled action, *Terri Bermudez, Personal Representative of the Estate of Tonya Vonda v. PeaceHealth d/b/a PeaceHealth Ketchikan Medical Center and NES Healthcare Group, Inc.*, Case No. 1KE-16-00514 CI, in the Superior Court for the State of Alaska, First Judicial District at Ketchikan. The Complaint alleges damages in excess of \$100,000.00. Therefore, on information and belief and without conceding same, Plaintiff's claims exceed \$75,000.00. A true and correct copy of the Complaint and Summons is attached hereto as **Exhibit B** and is incorporated herein by reference as though fully set forth.

2. The Complaint alleges Plaintiff Terri Bermudez is the personal representative of the estate of the decedent Tonya Vonda, and upon information and belief, the decedent Tonya Vonda was a citizen of Alaska and residing in Alaska at the time of her death.

3. Defendant PeaceHealth is a not-for-profit corporation organized under the laws of the state of Washington with its principal place of business in Vancouver, Washington, and it does business in Alaska under the name PeaceHealth Ketchikan Medical Center. Defendant PeaceHealth's corporate citizenship is Washington.

4. Upon information and belief, the other Defendant referred to as "NES Healthcare Group, Inc." is NES Washington, Inc., which is incorporated under the laws

of the state of Washington with its corporate headquarters in Tiburon, California, and it does business in Alaska as NES of Alaska ("NES").

5. The United States District Court has jurisdiction over the Superior Court action in this matter, based on diversity of citizenship of the parties pursuant to 28 U.S.C. § 1332.

7. Removal of this case is timely under 28 U.S.C. § 1446(b) because this notice is filed within 30 days of PeaceHealth's receipt of a copy of the complaint and summons.

8. On March 14, 2017, counsel entered an appearance on behalf of the estate of Tonya Vonda, and on March 22, 2017, the Summons and Complaint were served on the registered agent for PeaceHealth d/b/a PeaceHealth Ketchikan Medical Center. A copy of the Return of Service is attached hereto as **Exhibit C**.

9. PeaceHealth expressly consents to this notice of removal.

10. The notice to State Superior Court of the notice of removal is being filed contemporaneously with this notice in federal court.

DATED this 21st day of April, 2017, at Anchorage, Alaska.

DELANEY WILES, INC.
Attorneys for Defendant
PeaceHealth d/b/a PeaceHealth
Ketchikan Medical Center

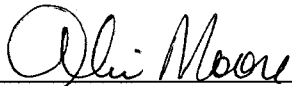
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CERTIFICATE OF SERVICE

This certifies that I am employed in the office of DELANEY WILES, INC., and that on the 21st day of April, 2017, I caused a true and correct copy of the foregoing document to be served by email and mail upon:

Whitney Power
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Alice Moore/4820-5852-1159, v. 1